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10 *Attorneys for Plaintiff, Wells Fargo Bank National Association, as Trustee for the Holders of the*  
11 *First Franklin Mortgage Loan Trust 2006-FF15 Mortgage Pass-Through Certificates, Series*  
12 *2006-FF15*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 WELLS FARGO BANK NATIONAL  
16 ASSOCIATION, AS TRUSTEE FOR THE  
17 HOLDERS OF THE FIRST FRANKLING  
18 MORTGAGE LOAN TRUST 2006-FF15  
19 MORTGAGE PASS-THROUGH  
20 CERTIFICATES, SERIES 2006-FF15,

Plaintiff,

vs.

RICARDO FOJAS, an individual;  
FERDINAND VASQUEZ, an individual;;  
HIDDEN CANYON OWNERS  
ASSOCIATION, a domestic corporation,

Defendants.

**Case No.: 2:16-cv-02449-GMN-NJK**

**STIPULATED REQUEST TO EXTEND  
TIME TO SUBMIT DISMISSAL PAPERS**

21 COMES NOW, Plaintiff, Wells Fargo Bank National Association, as Trustee for the  
22 Holders of the First Franklin Mortgage Loan Trust 2006-FF15 Mortgage Pass-Through  
23 Certificates, Series 2006-FF15 (hereinafter "Wells Fargo"), Hidden Canyon Owners Association  
24 ("HOA"), by and through respective counsel of record, and Defendants, Ricardo Fojas and  
25 Ferdinand Vasquez, (hereinafter "Defendants"); (collectively, the "Parties"), and hereby submit  
26 their Stipulated Request to Extend Time To Submit Dismissal Papers (the "Stipulation").  
27  
28

1           **WHEREAS** On January 5, 2018, Wells Fargo filed a Notice of Settlement in this matter.  
2  
3           [Docket No. 62].

4           **WHEREAS** On January 17, 2018, this Court issued a minute order, requiring the parties  
5 submit their dismissal papers by February 5, 2018. [Docket No. 63].

6           **WHEREAS** On February 2, 2018, the Parties jointly filed a Joint Settlement Status  
7 Report with the Court, explaining that the Parties were diligently working on the provisions of  
8 the global settlement agreement and requested sixty (60) additional days to complete and execute  
9 the settlement agreement prior to submitting its dismissal papers. [Docket No. 65].

10           **WHEREAS** On February 5, 2018, the Court issued an Order extending the deadline to  
11 file dismissal papers to March 7, 2018. [Docket No. 66].

12           **WHEREAS** The Parties can now report to the Court that the settlement agreement has  
13 been finalized by counsel for all parties. It has been executed by Plaintiff, Plaintiff's counsel,  
14 Defendant Ricardo Fojas, Defendant Ferdinand Vasquez and agreed to by HOA's counsel and is  
15 awaiting signature by HOA.

16           **THEREFORE IT IS HEREBY STIPULATED AND JOINTLY REQUESTED** that  
17 the Parties hereby request an additional forty-five (45) days to complete all signatures, exchange  
18 all settlement monies pursuant to the settlement agreement and file dismissal papers.

19  
20  
21           **I. Signatures Pursuant to LR 26-3**

22           This stipulation is signed in accordance with FRCP 26(g)(1) and LR 26-3. Each signature  
23 constitutes a certification that, to the best of the signer's knowledge, information, and belief,  
24 formed after a reasonable inquiry, the disclosures made by the signer are complete and correct as

25  
26  
27           //

28           //

of this time.

DATED this 7th day of March, 2018.

**WRIGHT, FINLAY & ZAK, LLP**

/s/ Robert A. Riether, Esq.

Robert A. Riether, Esq.

Nevada Bar No. 12076

7785 W. Sahara Ave., Suite 200

Las Vegas, Nevada 89117

*Attorneys for Plaintiff, Wells Fargo Bank*

*National Association, as Trustee for the*

*Holders of the First Franklin Mortgage Loan*

*Trust 2006-FF15 Mortgage Pass-Through*

*Certificates, Series 2006-FF15*

DATED this 7th day of March, 2018.

**FERDINAND VASQUEZ**

/s/ Ferdinand Vasquez (with permission)

Ferdinand Vasquez

7940 Quail Heaven Street

Las Vegas, NV 89131

*Defendant*

DATED this 7th day of March, 2018

**PENGILLY LAW FIRM**

/s/ Elizabeth Lowell, Esq. (With permission)

Elizabeth B. Lowell, Esq.

Nevada Bar No. 8551

1995 Village Center Circle, Suite 190

Las Vegas, NV 89134

*Attorneys for Hidden Canyon Homeowners*

*Association*

DATED this 7th day of March, 2018.

**RICARDO FOJAS**

/s/ Ricardo Fojas (with permission)

Ricardo Fojas

2413 Pickwick Drive

Henderson, NV 89014

ricfojas2002@yahoo.com

*Defendant*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: March 7, 2018